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File No.: 99999-101

November 18, 2003

Via Certified Mail RRR and Facsimile

Jeff S. Jordan, Supervising Attorney
Federal Election Commission
Washington, DC 20463

RE: Jordan Glatt/MUR 5393

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
2003 NOV 25 A 9:47

Dear Mr. Jordan:

This firm has been retained by Mayor Jordan Glatt regarding the above referenced Complaint filed with the Federal Election Commission by the Summit City Republican Committee. Accordingly, attached is a completed and executed Statement of Designation of Counsel. Additionally, our response to the Complaint is detailed below.

Jordan Glatt is the Mayor of Summit, New Jersey. Mayor Glatt has been very active with the New Jersey State Democratic Party and various candidates for state and federal office over the years. His contributions to various committees and candidates have been within the limits and letter of the law in all instances. The Complaint filed by the Summit City Republican Committee is not only unsupported by facts or law, it is obviously politically

motivated. The Complaint alleges that Mr. Glatt violated "federal" election laws by making completely legal contributions to state and county political party committees in New Jersey. The Summit City Republican Committee does not, because it cannot, suggest that the actual contributions violate any specific federal or state campaign laws or regulations. Rather, the Republican Committee insinuates that the contributions were simply "passed through" to a congressional campaign committee. These allegations are totally unsupported by facts or evidence, and if taken at face value, would render every otherwise lawful contribution to a county or state political party committee as potentially a "pass through" contribution. The allegations are self-serving and nothing more than a politically motivated public relations maneuver.

Mayor Glatt's corporate contributions to the Democratic State Committee were within acceptable limits and did not violate any state laws or regulations. Likewise, no violation of the Federal Election Campaign Act resulted. There are no requirements under New Jersey's election laws that a contributor identify how each dollar contributed is used. Moreover, the Complaint at issue simply insinuates, by referencing general, legal expenditures by these committees, that a corporate contribution was "passed through" to a candidate for federal office. No specific evidence, facts, etc. are submitted in support of the claims. Mayor Glatt made these lawful contributions with the understanding that the recipient would use the funds for whatever lawful political purposes it deemed necessary.

If the Summit City Republican Committee had any factual basis for a complaint it would be that the legal and proper contributions by Mayor Glatt were improperly distributed

by the recipient committees. The proper forum for such a complaint would be the New Jersey Election Law Enforcement Commission and the proper respondents would be the recipient political committees. Such a complaint would certainly have been quickly dealt with and dismissed by the New Jersey Election Law Enforcement Commission.

Filing in the correct forum with the correct respondent would not have served the purely political purpose of the Summit City Republican Committee to malign the Mayor during the closing days of an election. The Complaint was filed on October 23, 2003, less than two weeks before Mayor Glatt was elected. The Complaint is clearly politically motivated, and was filed solely for publicity purposes. Respectfully, no further resources, time or effort should be expended on such a frivolous claim.

Please contact me at the above direct number should you require any further information or have any questions.

Very truly yours,


Richard J. Van Wagner

cc: Honorable Jordan Glatt (via facsimile)